

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

THE FASHION EXCHANGE LLC,

Plaintiff,

v.

HYBRID PROMOTIONS, LLC, *et al.*,

Defendants.

No. 1:14-cv-01254 (SHS)

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that, upon the accompanying Declaration of Joel H. Rosner, dated October 13, 2023, the accompanying Memorandum of Law in Support, dated October 13, 2023, and all prior pleadings and proceedings had herein, the undersigned attorneys for Defendants Hybrid Promotions, LLC, Jarrod Dogan, Gavin Dogan, Jeff Caldwell, and the Retailers<sup>1</sup> (collectively, “Defendants”) will move this Court, before the Honorable Sidney H. Stein, at the courthouse located at 500 Pearl Street, New York, New York, at a place and time to be determined by the Court, for an order: (i) granting Defendants’ motion for an award of their attorney’s fees and costs under 15 U.S.C. § 1117(a), 28 U.S.C. § 1927, and Fed. R. Civ. P. 54(d); (ii) pursuant to Fed. R. Civ. P. 54(d)(2)(C), granting Defendants permission to file a fee application setting forth and supporting the amount and reasonableness of Defendants’ requested fees and expenses; and

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<sup>1</sup> The “Retailers” are all the active corporate defendants in this matter other than Hybrid and Sears Brands, LLC.

(iii) such other relief as the Court deems just and proper.

Dated: New York, New York  
October 13, 2023

Respectfully submitted,

**TARTER KRINSKY & DROGIN LLP**

*Attorneys for Defendants Hybrid Promotions, LLC,  
Jarrod Dogan, Gavin Dogan, Jeff Caldwell,  
and Retailers*

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